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PROJECT NO. 51840

RULEMAKING TO ESTABLISH ELECTRIC WEATHERIZATION STANDARDS	)))	**PUBLIC UTILITY COMMISSION OF TEXAS**

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COMMENTS OF NATIONAL GRID RENEWABLES

National Grid Renewables ("NG Renewables") is pleased to file these comments in response to the request for comments by the Public Utility Commission of Texas ("PUCT") staff in Project 51840, *Rulemaking Establishing Electric Weatherization Standards.*

NG Renewables develops wind, solar and storage projects throughout the United States and is actively involved in development activities in Texas, and specifically the ERCOT region. Accordingly, the company has a direct interest in this proceeding and looks forward to working with the PUCT and interested parties in addressing the weatherization issue in ERCOT.

I. INTRODUCTION

The weather events of February 2021 in Texas and the Midwest highlighted the potential vulnerabilities of the electric grid, as well as other infrastructure, to unanticipated extreme weather during the winter months. Accordingly, NG Renewables commends the Texas legislature and the PUCT for taking action to facilitate changes that will enhance the reliability of the electric grid components via weatherization requirements.

With respect to question 1 in the request for comments, NG Renewables is not commenting on specific weather parameters for a rule, such as those outlined in the request for comments (i.e. wind, temperature, icing, flooding or drought).[1] Prescribing specific conditions under which units must operate is not effective in the short or long-term. Due to the differences in generation technology types and equipment types/manufacturers, it is more appropriate to focus on a qualitative approach to weatherization that accommodates the flexibility and discretion necessary to design site specific cold weather programs that facilitate maximum performance relative to a facility's particular circumstances and related practical limits. NERC has recently revised its mandatory and enforceable reliability standards to address weatherization of generating units in this manner. Those revisions are consistent with a flexible approach that enables informed discretion in the development of cold weather plans and programs. Consistent with these general perspectives, NG Renewables offers the following comments.

[1] NG Renewables notes that it is not commenting on question 2 in the request for comments, which focuses on municipals, cooperatives and transmission and distribution utilities.

II. COMMENTS[2]

NERC has recently issued changes to its mandatory and enforceable reliability standards that address weatherization. Specifically, the revised NERC Cold Weather Standards are[3]:

- EOP-011-2: *Emergency preparedness and operations;*
- IRO-010-4: *Reliability coordinator data specification and collection*; and
- TOP-003-5: *Operational reliability data.*

EOP-011-2 requires generator owners to establish cold weather preparedness plans that are required to meet several requirements relating to unit freeze protection measures based on geographical location and plant configuration, annual inspection and maintenance of the freeze protection measures and several specific cold weather data requirements. The revisions also require training of site personnel on the cold weather plan.

The revisions to IRO-010-4 expand the scope of the data a Reliability Coordinator ("RC") is required to obtain. The expanded scope includes information related to generation operations during cold weather, and specific minimums, including design temperature, historical operating temperature and current cold weather performance temperature.

Finally, the changes to TOP-003-5 provide for the same expansion in scope of the data required under IRO-010-4 but apply it to the data specification requirements for the Transmission Operator ("TOP") and Balancing Authority ("BA").

In essence, the changes to the NERC reliability standards:

1) Require generating plants to have cold weather operation plans in place and that relevant personnel be trained on those plans; and
2) Require the provision of pertinent generating cold weather operational information and data to the critical reliability entities that are responsible for the operation of the grid (the RC, TOP and BA).

The NERC standards will facilitate that ability of generating units to perform more effectively and consistent with their practical limitations during cold weather via programs applied to their equipment. In addition, they will enhance the ability of site personnel to effectively manage plants during cold weather events in accordance with the facility plans. These changes in NERC's rules should mitigate outages during winter extremes. The new standards will also mitigate reliability events by enhancing the information available to grid operators. The increased visibility into resource's cold weather data and information will enable system operators to better manage resources consistent with their parameters during relevant conditions.

The weatherization revisions to the NERC reliability standards also provide flexibility where appropriate. For example, although the standard requires a plan to include freeze protection measures, it does not

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[2] NG Renewables notes that is generally supports the comments being provided by the Advanced Power Alliance in Project 51840.

[3] The new weatherization requirements were implemented in existing reliability standards. The revised standards still require Federal Energy Regulatory Commission approval.

prescribe specific measures. Rather, it leaves the determination of the site-specific measures to the entity. Similarly, the standard imposes an annual inspection and maintenance requirement for the freeze protection measures employed by a generator, but it does not dictate the particulars of those activities.

This flexibility is appropriate because there are significant differences between generating unit technology types. Even for similar technologies facilities may utilize different equipment. These differences may warrant different weatherization approaches and cold weather management programs. In essence, absent mandating specific informational requirements, the approach NERC has taken with respect to the development of programs is to mandate the "what", but it leaves the "how" to the subject entities. Given the different technologies and equipment types/manufacturers employed and utilized by different entities, this tack is appropriate and will facilitate the ability to employ best practices across time in the most cost effective and reliable manner, which will benefit consumers in terms of cost and reliability.

Consistent with the above discussion, NG Renewables believes that PUCT staff should keep the following considerations in mind as it deliberates addressing the issue of weatherization requirements for the ERCOT region:

1) Consider the adequacy of the revised NERC standards in addressing weatherization for generators in the ERCOT region;
2) Avoid redundant rules - NERC is in the process of issuing effective cold weather requirements for generators and these will apply to jurisdictional generators in the ERCOT region;
3) Avoid incremental rules that provide no added reliability value relative to the NERC standard; and
4) Provide appropriate flexibility and discretion when advisable and possible – *i.e.* establish the "what" and not the "how" – as discussed, given the differences between resource technologies and equipment types and performance specs and limitations, the provision of flexibility and discretion in the implementation of cold weather programs is appropriate.

III. CONCLUSION

NG Renewables offers the foregoing comments for PUCT staff's consideration in Project 51840. We look forward to working with and supporting the PUCT in addressing weatherization of generating units in the ERCOT region, and in particular, renewable generating units.

Respectfully submitted,

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